



John Troy &lt;johntroy@troypllc.com&gt;

**Re: Wang et al v. Chapei et al.**

1 message

Troy Law &lt;troylaw@troypllc.com&gt;

Wed, Jul 13, 2016 at 5:18 PM

To: Heng Wang &lt;heng.wang@wanggaolaw.com&gt;, Troy Law &lt;troylaw@troypllc.com&gt;

Cc: ashley.pappas@wanggaolaw.com

Mr. Wang,

That extension was mutually agreed upon. Also, how on earth does that cause further delay? It is an extension. It does us no good to receive discovery responses a day or so before depositions are due.

The notices of deposition were fixed and mailed to you after you objected to the first set. No one is trying to depose your client in New York, they state that the deposition would be in New Jersey. We have not set a firm location because deposing in New Jersey would require us to use a conference room from the Court Reporting Aervices, and we are disinclined to pay for a Court Reporter and conference room too far in advance given your behavior. The only imaginable thing you have left to object to is that they do not list through what means the depositions would be recorded, which is stenographic, if you must know. We are tired of your tactics. For someone who purports to be enamored with the Local Rules of New Jersey and the Federal Rules of Civil Procedure, you seemed disinclined to follow them at every turn. You have not conducted a single aspect of discovery in good faith, and thus Plaintiffs are turning to the Court.

-John Troy  
/ic

**TROY LAW****Attorneys & Counselors at Law**

Queens: 41-25 Kissena Blvd., Suite 119, Flushing, NY 11355 Tel: (718) 762-1324

Taipei: 11F, No. 372, Linsen N. Rd., Taipei City 10446, Taiwan Tel: +886-2-2571-2572

蔡鴻章律師事務所

*Our firm does not accept paper or fax correspondence, including service and production of documents, which must be sent by e-mail*

On Fri, Jul 8, 2016 at 5:43 PM, Heng Wang &lt;heng.wang@wanggaolaw.com&gt; wrote:

Mr. Troy,

I don't take blame from you. We are doing discovery in good faith. This short delay was caused at least in part by your own request for an extension. We are finalizing the discovery responses and will send them over to you early next week. There is no need to compel people to do what they have agreed to do.

I will not produce my client for deposition unless and until you comply with the procedural rules. She will not be deposed day to day until you have asked all your questions. This is a New Jersey case. We

will not send her to a deposition in New York. If you are willing to come to my office for the deposition, I will entertain it after you fix other issues related to your deposition notice.

--

Heng Wang, Esq.

Wang, Gao & Associates, P.C.

36 Bridge Street  
Metuchen, NJ 08840  
Tel: (732) 767-3020  
Fax: (732) 343-6880

305 Broadway, Suite 1000

New York, NY 10007

Tel: (646) 543-5848

Fax: (646) 572-8998

[www.wanggaolaw.com](http://www.wanggaolaw.com)

NOTE: This transmittal may be a confidential attorney-client communication or may otherwise be privileged or confidential. If it is not clear that you are the intended recipient, you are hereby notified that you have received this transmittal in error; any review, dissemination, distribution, or copying of this transmittal is strictly prohibited. If you suspect that you have received this communication in error, please notify us immediately by telephone at (732) 767-3020, or e-mail at [info@wanggaolaw.com](mailto:info@wanggaolaw.com), and immediately delete this message and all its attachments.

---

**From:** Troy Law [mailto:[troylaw@troypllc.com](mailto:troylaw@troypllc.com)]

**Sent:** Thursday, July 07, 2016 5:14 PM

**To:** Heng Wang; Troy Law

**Subject:** Re: Wang et al v. Chapei et al.

Mr. Wang,

Unless we receive substantial discovery responses via email in PDF format by 5:00PM Friday July 08, and you can produce your client Cha Lee Lo by 07/14/2016 to be deposed in NJ, we will write to the Court. We have been trying for three weeks to get our responses from you and you continue to delay. The deadline for paper discovery was set by the Court over a month ago. We need to be done with depositions by July 15. Unless you can provide discovery within the aforementioned timeline or have an incredibly good explanation as to why the Court should grant another extension of time (when it has already said that it would not during the April 20 Conference), we feel like we have no choice but to write to the court. You are doing the same delaying tactics as before and we have tried in Good Faith to reach the deadlines set by Judge Arpert.

-John Troy  
/ic

**TROY LAW**

**Attorneys & Counselors at Law**

Queens: 41-25 Kissena Blvd., Suite 119, Flushing, NY 11355 Tel: (718) 762-1324  
Taipei: 11F, No. 372, Linsen N. Rd., Taipei City 10446, Taiwan Tel: +886-2-2571-2572

蔡鴻章律師事務所

*Our firm does not accept paper or fax correspondence, including service and  
production of documents, which must be sent by e-mail*

On Thu, Jul 7, 2016 at 3:12 PM, Heng Wang <[heng.wang@wanggaolaw.com](mailto:heng.wang@wanggaolaw.com)> wrote:

Mr. Troy, I just received additional information. I will put them together and send it to you in a couple of days.

--

Heng Wang, Esq.

Wang, Gao & Associates, P.C.

36 Bridge Street  
Metuchen, NJ 08840  
Tel: (732) 767-3020  
Fax: (732) 343-6880

305 Broadway, Suite 1000

New York, NY 10007

Tel: (646) 543-5848

Fax: (646) 572-8998

[www.wanggaolaw.com](http://www.wanggaolaw.com)

NOTE: This transmittal may be a confidential attorney-client communication or may otherwise be privileged or confidential. If it is not clear that you are the intended recipient, you are hereby notified that you have received this transmittal in error; any review, dissemination, distribution, or copying of this transmittal is strictly prohibited. If you suspect that you have received this communication in error, please notify us immediately by telephone at (732) 767-3020, or e-mail at [info@wanggaolaw.com](mailto:info@wanggaolaw.com), and immediately delete this message and all its attachments.

---

**From:** Troy Law [mailto:[troylaw@troypllc.com](mailto:troylaw@troypllc.com)]  
**Sent:** Wednesday, July 06, 2016 12:56 PM  
**To:** Wang Gao Law; Troy Law  
**Subject:** Wang et al v. Chapei et al.

Mr. Wang,

On July 1, 2016 this office called you twice and were told each time that you were at lunch even though the calls were placed hours apart. We have also not received any kind of response from our June 23, 2016 email delaying depositions of your clients as we have not yet received any responses to our discovery requests that were re-served to you via mail. You also did not clarify what specific and timely objections you had with our depositions so that we could correct them. We would like to remind you that the deadline to complete depositions is July 15, 2016. May we please confer about the status of your responses and depositions? If not, we will be forced to write to the Court.

Regards,

John Troy.

/ic

**TROY LAW**

***Attorneys & Counselors at Law***

Queens: 41-25 Kissena Blvd., Suite 119, Flushing, NY 11355 Tel: (718) 762-1324  
Taipei: 11F, No. 372, Linsen N. Rd., Taipei City 10446, Taiwan Tel: +886-2-2571-2572

蔡鴻章律師事務所

*Our firm does not accept paper or fax correspondence, including service and  
production of documents, which must be sent by e-mail*